

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

**KARINA GARCIA, MARIA )  
MATA, CHLOE BROOKS, )  
ANITA TREVINO, KARLENE )  
CARPENTER, TANISHA )  
WILLIAMS, SAMUEL TORRES, )  
MARLENE BURCH, )  
ROZEPHYR JEAN, )  
Individually and on Behalf )  
All Others Similarly Situated, )**

**Plaintiffs,**

**vs.**

**) CIVIL ACTION NO: 18-cv-00621-MAC**

**WILLIS STEIN & PARTNERS, )  
L.L.C., MONROE CAPITAL, )  
LLC, EDUCATION )  
CORPORATION OF AMERICA, )  
VIRGINIA COLLEGE, LLC, )  
BRIGHTWOOD COLLEGE, )  
BRIGHTWOOD CAREER )  
INSTITUTE, VIRGINIA )  
COLLEGE, ECOTECH )  
INSTITUTE, STUART C. REED, )  
AVY HOWARD STEIN, )  
THEODORE KOENIG, JACKIE )  
BAUMANN, AND ERIN SHEA )**

**Defendants.**

**PLAINTIFFS' NOTICE OF DISMISSAL OF DEFENDANT AARON BARKSDALE**

Plaintiffs file their notice of dismissal of Defendant Aaron Barksdale under Federal Rule of Civil Procedure 41(a)(1)(A)(i).

1. On December 12, 2018, Plaintiffs sued defendants Virginia College, LLC d/b/a Brightwood College, Education Corporation of America, Willis Stein & Partners, L.L.C., Stuart C. Reed, and Aaron Barksdale.
2. Defendant Aaron Barksdale has been served with process and has not served an answer or motion for summary judgment.
3. The proposed class has not yet been certified.
4. A receiver has not been appointed in this case.
5. This case is not governed by any federal statute that requires a court order for dismissal of the case.
6. Plaintiffs have not previously dismissed any federal – or state-court suit based on or including the same claims as those presented in this case.
7. Only defendant, Aaron Barksdale, is dismissed from this lawsuit.
8. This dismissal is without prejudice.

Respectfully submitted,

**THE FERGUSON LAW FIRM, LLP**

/s/ Mark C. Sparks

Mark Sparks

Texas Bar No. 24000273

[mark@thefergusonlawfirm.com](mailto:mark@thefergusonlawfirm.com)

Timothy M. Ferguson

Texas Bar No. 24099479

[tferguson@thefergusonlawfirm.com](mailto:tferguson@thefergusonlawfirm.com)

350 Pine Street, Suite 1440

Beaumont, Texas 77701

(409) 832-9700 Phone

(409) 832-9708 Fax

and:

**BAILEY REYES, PLLC**

Christopher A. Bailey  
Texas Bar No. 24104549  
[chris@baileyreyes.com](mailto:chris@baileyreyes.com)  
Julliana Reyes  
Texas Bar No. 24103899  
[julie@baileyreyes.com](mailto:julie@baileyreyes.com)  
470 Orleans Street, Suite 950  
Beaumont, Texas 77701  
(409) 239-0123 Phone  
(409) 895-2363 Fax

**CERTIFICATE OF SERVICE**

I hereby certify that on February 8, 2019, a true copy of the foregoing has been served upon all parties or their attorneys contemporaneously with or before the filing of this pleading, in a manner authorized by Federal Rule of Civil Procedure, via email and certified mail.

/s/ Mark Sparks  
Mark Sparks